

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN SCATCHELL,)	
)	
Plaintiff,)	Case No. 18-cv-3989
)	
vs.)	
)	Honorable Charles R. Norgle, Sr
VILLAGE OF MELROSE PARK,)	
RONALD M SERPICO, SAM C. PITASSI,)	Honorable Michael T. Mason
MICHAEL CASTELLAN, and)	
STEVE ROGOWSKI)	JURY TRIAL DEMANDED
)	
Defendants.)	

**DEFENDANTS' AGREED JOINT MOTION FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS**

NOW COMES the Defendants, SAM C. PITASSI, MICHAEL CASTELLAN and STEVE ROGOWSKI, by and through their attorney, MICHAEL D. BERSANI of HERVAS, CONDON & BERSANI, P.C.; VILLAGE OF MELROSE PARK, by and through its attorney, JEFFREY S. FOWLER of LANER MUCHIN, LTD.; and RONALD M. SERPICO by and through his attorney, K. AUSTIN ZIMMER of DELGADO LAW GROUP, LLC., and move this Honorable Court for entry of an order granting the Defendants additional time to file their answer or otherwise respond to the Plaintiff's complaint to November 21, 2018.

In support thereof, Defendants state the following unto this Honorable Court:

1. Plaintiff John Scatchell filed a complaint on June 7, 2018 against Defendants, Village of Melrose Park, Ronald M. Serpico, Sam C. Pitassi, Michael Castellan and Steve Rogowski (hereinafter "Defendants").

2. The Defendants were served with summons on or about October 1, 2018. Responsive pleadings will be due on October 22, 2018

3. The undersigned needs additional time to conduct a thorough investigation of the allegations of the complaint and file the appropriate responsive pleadings.

4. An extension of time will not incur any prejudice on behalf of the Plaintiff as the result of the granting of this motion.

5. Plaintiff's counsel, Gianna R. Scatchell, has no objection to this motion.

6. In light of the above, Defendants respectfully request that this Honorable Court allow until November 21, 2018, in which to file responsive pleadings to the Plaintiff's complaint.

WHEREFORE, the Defendants, VILLAGE OF MELROSE PARK, RONALD M. SERPICO, SAM C. PITASSI, MICHAEL CASTELLAN and STEVE ROGOWSKI, respectfully request that this Honorable Court grant its motion for an extension of time in which to file their answer or otherwise respond to Plaintiff's complaint to November 21, 2018.

s/Michael D. Bersani
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s/Jeffrey S. Fowler
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CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2018, I electronically filed the foregoing ***Defendants' Agreed Joint Motion for Extension of Time to File Responsive Pleadings*** with the Clerk of the U.S. District Court for the Northern District of Illinois, Eastern Division, using the CM/ECF system which will send notification of such filing to the following CM/ECF participants:

TO: Gianna Rochelle Scatchell, 360 West Hubbard Street, Suite 1404, Chicago, IL 60654
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s/ Michael D. Bersani

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